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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HARRY M. REID,  
Plaintiff,

v.

KILOLO KIJAKAZI,  
Commissioner of Social Security,  
Defendant.

Case No.: 2:22-cv-01072-EJY

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
ANSWER AND CERTIFIED  
ADMINISTRATIVE RECORD  
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), through her undersigned counsel, hereby requests an extension of time to file her answer and Certified Administrative Record (CAR) in this case, for good cause shown. This is the Commissioner’s first motion for an extension. The Commissioner’s answer and CAR are currently due to be filed by September 13, 2022. The Commissioner requests an extension of 28 days in which to file the answer and CAR, which would move the due date to October 11, 2022. Counsel for Defendant advised counsel for Plaintiff of the need for this extension on September 12, 2022. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

Defendant makes this request in good faith and for good cause, because the CAR, which must be filed with the answer and is necessary to adjudicate the case, is not yet available. On September 12, 2022, counsel for Defendant contacted the Social Security Administration's Office of Appellate Operations (OAO) in Falls Church, Virginia, which is responsible for producing the CAR that must be filed with the answer, per 42 U.S.C. § 405(g) and (h). A representative from the OAO stated that unforeseen technical difficulties had delayed them in producing the paper courtesy copy of the CAR that is necessary to provide to the Court, and estimated that they would need an additional 28 days to print and provide a paper CAR. Additionally, technical difficulties pertaining to internal technical systems within the Social Security Administration and the United States Attorney's Office (USAO) have prevented the OAO, the USAO, and the Office of the General Counsel (OGC), from being able to file an electronic version of the CAR with the Court by the current deadline.

Accordingly, Defendant requests an extension of 28 days in which to file the answer and CAR, changing the due date for the answer and CAR from September 13, 2022, to October 11, 2022.

Dated: September 12, 2022

Respectfully submitted,

JASON M. FRIERSON  
Acting United States Attorney

*/s/ David Priddy*  
DAVID PRIDDY  
Special Assistant United States Attorney

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: September 13, 2022